

**REMARKS**

Applicants thank the Examiner for the continued attention to the current application. Claims 1 - 10 and 23 - 25 of the application were examined. Claims 1, 10 and 23 have been amended. New claims 27 and 28 have been added. These amendments are supported by the specification as originally filed, and in particular at page 15, lines 26 - 34, and page 34, lines 15 - 30.

**Claim Rejections - 35 USC § 112**

The Examiner has rejected independent claims 1 and 10 under 35 U.S.C. 112 as allegedly being indefinite. The Examiner has alleged that it is unclear what concrete steps are involved in providing the recited components of the claims, and that with regards to the recited scripts, it is unclear whether providing these scripts is intended to mean creating the scripts or actually executing the scripts. Applicants respectfully request reconsideration of the rejection based on the amended claims and at least the reasons set forth below.

Applicants have amended claims 1 and 10 to clarify that the instructions that are executed by the processor configure the processor and memory to provide the recited viewer component. Applicants respectfully submit that the amended claim clarifies how the executed instructions provide the viewer.

Regarding the alleged providing of the scripts, Applicants respectfully submit that the executed instructions configure the processor and memory to provide a viewer component, and that the viewer component comprises the collection of scripts. Applicants have amended the claim to clarify that the scripts manipulate the document object model (DOM) when the viewer detects the occurrence of the event associated with the behavior element.

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Applicants respectfully submit that the amended claims clarify the scope of protection sought, and that the claims comply with 35 U.S.C. 112.

#### **Claim Rejections - 35 USC § 101**

The Examiner has rejected claims 1 - 10 under 35 U.S.C. 101 as allegedly being directed towards non-statutory subject matter. Applicants respectfully request reconsideration of the rejection based on the amended claims and at least the reasons set forth below.

Applicants have amended the claims to clarify that the system comprises a memory for storing instructions and a processor for executing the instructions which configure the processor and memory in order to provide the viewer. Applicants respectfully submit that amended independent claims 1 and 10, and dependent claims 2 - 9, recite statutory subject matter, and so comply with 35 U.S.C. 101.

#### **Claim Rejections - 35 USC § 103**

The Examiner has rejected claims 1 - 9 and 23 - 25 under 35 U.S.C. § 103(a), as allegedly being unpatentable over U.S. Patent No. 6,981,211 of Claussen et al. (hereinafter Claussen) in view of Applicants' admitted prior art of Figure 1 and its associated text of the present application. Applicants respectfully request reconsideration of the rejection based on the clarified claims and at least the reasons set forth below.

Claussen teaches a method for processing a DOM in order to generate a servlet for serving a web page (col 4, ln. 42 - 63). The method of Claussen is performed on a server and used to convert a file expressed in simple markup language including custom DOM tags into script code by a generic java object or an XSL stylesheet. The method of Claussen compiles the script code into Java code and then into a Java servlet (col 31, ln 65 - col 32, ln 3). The generated Java servlet is then loaded and invoked with standard HTTP Request and Response

objects. The servlet generates a response which is provided to the client browser for rendering in the usual manner (col 5, ln 9 - 19).

Applicants respectfully submit that Claussen describes a system and method for processing a DOM in order to generate a Java servlet, which is used to provide data back to a client browser. This does not teach or suggest the subject matter of amended independent claim 1, which recites in part that each script of the collection of scripts is associated with a behavior element of the collection of behaviour elements through the event attribute of the behavior element. The teachings of Claussen also fail to teach or suggest that the scripts of the viewer manipulate the document object model in a predefined manner according to the other attributes of the behavior element when the viewer detects the occurrence of the event associated with the behavior element.

The Examiner has alleged that the teachings of Claussen when combined with the Applicants' admitted prior art of a viewer 13 of Figure 1 disclose all of the limitations recited by the claims, and that it would have been obvious to one of ordinary skill in the art to utilize such a viewer 13 for the creating manipulating and displaying of a DOM from the received markup file as part of making use of know software tools for their intended purpose.

Applicants respectfully submit that the system and method of Claussen are intended for creating a servlet on a server, while the viewer 13 of Figure 1 is for displaying the data provided according to the teachings of Claussen (col 5, ln 17 - 18). Applicant's respectfully submit that the Examiner appears to have combined the teachings of Claussen in a manner that is contrary to the intended purpose taught by Claussen, namely applying a method described as providing a servlet on a server to a viewer 13 in a browser. Applicants submit that the DOM that is processed by Claussen would not be displayed by a viewer 13 of a browser. The DOM

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of Claussen is used to produce a Java servlet that can serve data to a client's browser. Thus, one skilled in the art would not combine the teachings of Claussen, which are intended for creating a servlet on a server, with a viewer 13 of a browser on a client.

Applicants have further amended the claims to clarify that the DOM is created from a markup file describing a user interface. Applicants respectfully submit that Claussen clearly does not teach a DOM that is created from a markup file describing a user interface. As set forth above the DOM of Claussen may be considered as describing a servlet, which does not teach or suggest the DOM created by a markup file that describes a user interface, as recited by the amended claim.

Furthermore, Applicants respectfully submit that the viewer 13 described in the current application with regards to Figure 1, generally describes a standard browser architecture including a viewer 13 plug-in that can be associated with any file format that is not already natively supported by the browser 11 and allows the browser to render that file within the browser window. The viewer 13 is generically described as providing rendering of any file type, and does not disclose the viewer recited by the current claim. Applicants respectfully submit that neither the generic viewer 13 described with reference to Figure 1 of the current application, nor the teachings of Claussen disclose the subject matter of the amended independent claims. In particular, there is no teaching or suggestion of an event attribute for associating the behavior element to an event monitored by the viewer. The teachings relied upon by the Examiner also fail to teach or suggest manipulating the document object model in a predefined manner according to the other attributes of the behavior element when the viewer detects the occurrence of the event.

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As set forth above, the teachings of Claussen and Figure 1 of the current application should not be combined as Claussen is clearly directed to a method for manipulating a DOM on a server to produce a servlet, while Figure 1 relates to a generic browser structure for displaying data in a browser of a client. Furthermore, even if the teachings are combined, they fail to teach or suggest all of the limitations of amended independent claim 1.

Applicants respectfully submit that amended independent claim 1, as well as dependent claims 2 - 9, which depend therefrom, are patentable over Claussen in view of the Applicant's admitted prior art and as such comply with 35 U.S.C. 103(a).

Regarding independent claim 23, Applicants have amended the claim in accordance with the amendments made to claim 1. Applicants respectfully submit that amended independent claim 23 and dependent claims 24 and 25, which depend therefrom, comply with 35 U.S.C. 103(a) for similar reasons as set forth above with regards to amended claim 1.

Applicants note that, while the Examiner did not reject independent claim 10 under 35 U.S.C. 103(a), Applicants have made similar amendments to the independent claim as those made to claim 1.

New claims 27 and 28 are dependent on claims 1 and 10, respectively, and are allowable for the same reasons above adduced relative to claims 1 and 10, as well as for their own additional limitations.

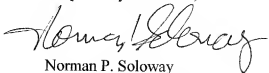
Having dealt with all the objections raised by the Examiner, the Application is believed to be in order for allowance. Early and favorable action are respectfully requested.

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In the event there are any fee deficiencies or additional fees are payable, please charge them (or credit any overpayment) to our Deposit Account Number 08-1391.

Respectfully submitted,



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I hereby certify that this correspondence is being deposited with the United States Patent Office via the electronic filing procedure on July 14, 2009.

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